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**From:** LEE, LILY [LEE.LILY@EPA.GOV]  
**Sent:** 10/10/2017 11:40:00 PM  
**To:** Brooks, George P CIV [george.brooks@navy.mil]  
**CC:** Janda, Danielle L CIV [danielle.janda@navy.mil]; Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil]; Karla Brasaemle (kbrasaemle@techlawinc.com) [kbrasaemle@techlawinc.com]; Kappelman, David [Kappelman.David@epa.gov]; Chesnutt, John [Chesnutt.John@epa.gov]  
**Subject:** Internal, deliberative, pre-decisional - examples of TU's in Parcel G with concerns/questions

Dear Pat,

Last week, I promised to give you a few examples of "NFA" survey units where we are interested to learn more about the Navy's reasons for its recommendations. This will help in our internal deliberations with the Navy (a sister Federal agency) before we make any decisions. Please keep this communication within the Federal agencies or Federal contractors.

As I said verbally last Thursday, we expect to give you an early informal indication by Friday 10/13 of which trench units in Parcel G we have high vs. medium vs. low concerns about. These will also be internal, deliberative, and predecisional. A more formal and thorough set of written comments will come later. The fill units levels of concern will correspond to the trench unit levels of concern. CDPH is looking first at the former buildings sites, so they will share any questions they have about those.

In the mean time here are some examples of situations where we have concerns. We will continue our reviews and will likely have more questions/concerns as we go along.

SU 71, 85, and 204: Please see the side-by-side box plots that I sent this morning to see results that we would not have expected. For example, at SU 85: The side-by-side box plots for all 3 radionuclides show the bias set lower than other sets. In addition, the Q-Q plots show slope breaks, a potential indication of different populations.

The SU 97 form states the following:

"Observations: Samples 9 to 79 show low concentrations of Bi-214 and Ac-228. Samples 9 to 40 were collected on 08/19/2008. Samples 41 to 79 were collected on 08/20/2008. These samples were counted on 08/21/2008, 08/22/2008, and 08/25/2008. These samples were not biased to a specific location, but were distributed along the bottom of the trench to investigate potential leaks from the pipes. These samples do not appear to be representative of conditions at TU097. The small volumes of soil removed to remediate areas of elevated activity would not result in changes to the entire distribution. "

"Gamma static dataset inconsistent (low variability) with FSS and gamma scan dataset. Gamma static measurements do not appear to represent conditions at TU096."

"Gamma scan results consistent with FSS dataset and inconsistent with gamma static dataset."

Scan/static surveyor "J. Cunningham" was named in the NRC petition as associated with falsification occurrence.

"Based on the findings of this evaluation, evidence of potential data falsification was found. It is unlikely the Biased Samples 9 to 79 represent actual conditions within TU097."

SU 98: The form states "Reported gamma static counts are suspect; ranged within an unusually narrow band between 4,211 and 4,632 gcpm. No reviewer or review date reported. Gamma static counts are not consistent with the reported

gamma scan range and FSS dataset.” Next, the form states “Scan range reported as 2,900 to 9,400 gcpm, apparently exceeding the investigation level of 7,048 gcpm without further explanation.” The Gamma static range is 421 gcpm (10%) vs. range of 240% for the scan range.

Similarly for SU 78, “Gamma static measurements range from 3,953 to 4,543 cpm” and “Gamma scan range reported at 3,000 to 7,000 cpm . . . . Gamma scan dataset is not consistent with gamma static data.”

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